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Attorneys for Defendant,
SOUTHWEST AIRLINES CO.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MINA REZK,

Plaintiff,

v.

SOUTHWEST AIRLINES CO.; and
DOES 1 through 100, Inclusive,

Defendants.

CASE NO. 2:18-cv-6446

**DECLARATION OF HILDA
AGUILAR IN SUPPORT OF
DEFENDANT SOUTHWEST
AIRLINES CO.'S NOTICE OF
REMOVAL OF ACTION PURSUANT
TO 28 U.S.C. §§ 1332, 1441 AND 1446**

Complaint Filed: May 21, 2018
Date of Removal: July 26, 2018

I, Hilda Aguilar, declare as follows:

1. I am over eighteen years of age, and have personal knowledge of each of the matters set forth below and, if called as a witness, could and would testify competently to each of them under oath.

2. This declaration is submitted in support of Defendant Southwest Airlines Co.'s Notice of Removal.

3. I am an attorney at Ford & Harrison and am counsel of record for Defendant in this case.

4. On May 21, 2018, Plaintiff Mina Rezk filed a complaint in the Superior Court of California, County of Los Angeles, titled "*Mina Rezk v.*

1 *Southwest Airlines Co., and Does 1-100,”* Case No. BC706875 (the “*State Court*
2 *Action*”).

3 5. True and correct copies of the Complaint, as well as all pleadings,
4 process, orders, and all other filings served upon or received by Defendants in the
5 State Court Action, are attached hereto as **Exhibit A.**

6 6. Plaintiff’s Complaint omits reference to Plaintiff’s residence. At
7 paragraph 25 of Plaintiff’s Complaint, it alleges that Plaintiff filed an administrative
8 complaint with the California Department of Fair Employment and Housing
9 (“DFEH”) on April 2, 2018, which is attached as an exhibit to the Complaint in the
10 State Court Action. Paragraph 2 of Plaintiff’s DFEH complaint states that Plaintiff
11 resides in the State of California. A true and correct copy of Plaintiff’s April 2,
12 2018 DFEH complaint and DFEH right to sue notice which is attached as an exhibit
13 to the Complaint in the State Court Action is attached hereto as **Exhibit B.**

14 7. To my knowledge, no further process, pleadings, or orders related to
15 this case have been filed in the Superior Court of California, Los Angeles County,
16 or served by any party.

17 8. Defendants will promptly notify Plaintiff and the Clerk of the Superior
18 Court of California, County of Los Angeles, that the case has been removed. A true
19 and accurate copy of the notices to be mailed and served are attached hereto as
20 **Exhibit C.**

21 I declare under penalty of perjury under the laws of the United States of
22 America and the State of California that the foregoing is true and correct.

23 Executed this 26TH day of July, 2018, in Los Angeles, California.

24
25 /s/ Hilda Aguilar
HILDA AGUILAR

PROOF OF SERVICE

I, Lillian Marquez, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 350 South Grand Avenue, Suite 2300, Los Angeles, California 90071.

On **July 26, 2018**, I served a copy of the following document(s) described as:

**DECLARATION OF HILDA AGUILAR IN SUPPORT OF
DEFENDANT SOUTHWEST AIRLINES CO.'S NOTICE OF REMOVAL
OF ACTION PURSUANT TO 28 U.S.C. §§ 1332, 1441 AND 1446**

on the interested parties in this action as follows:

Stephen J. Reiss, Esq.
LAW OFFICES OF STEPHEN J. REISS
4766 Park Granada, Suite 206
Calabasas, CA 91302
Tel: (818) 591-7990
Fax: (818) 591-7781
Email: sjreiss@gmail.com

Attorneys for Plaintiff,
MINA REZK

- ☐ **BY FACSIMILE:** I served a true and correct copy of the document(s) listed above via facsimile to the fax number(s) set forth below on this date before 5:00 p.m.
- ☒ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth above. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY OVERNIGHT MAIL:** by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- ☐ **BY PERSONAL SERVICE:** I caused such documents listed above to be hand delivered via Messenger Service Nationwide Legal to the person(s) at the address(es) set forth above.

1 ☐ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on an
2 agreement of the parties to accept service by e-mail or electronic
3 transmission, I caused the documents to be sent on the date shown below to
4 the e-mail addresses of the persons listed below. I did not receive within a
reasonable time after the transmission any electronic message or other
indication that the transmission was unsuccessful.

5 ☒ **ELECTRONICALLY:** I caused a true and correct copy thereof to be
6 electronically filed using the Court's Electronic Court Filing ("ECF") System
7 and service was completed by electronic means by transmittal of a Notice of
Electronic Filing on the registered participants of the ECF System. I served
those parties who are not registered participants of the ECF System as
indicated above.

8 I declare that I am employed in the office of a member of the State Bar of this
9 Court at whose direction the service was made. I declare under penalty of perjury
under the laws of the United States of America and State of California that the
above is true and correct.

10 Executed on **July 26, 2018**, at Los Angeles, California.

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13 Lillian Marquez
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